

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NOVAL WILLIAMS FILMS LLC,

Plaintiff,

-against-

JOHN BRANCA and JOHN MCCLAIN,
EXECUTORS OF THE ESTATE OF MICHAEL J.
JACKSON,

Defendants.

Case No. 1:14-cv-04711-PAC

- x

DECLARATION OF ANALISA VALLE

**IN SUPPORT OF THE EXECUTORS' MOTION FOR SUMMARY JUDGMENT OR, IN
THE ALTERNATIVE, SUMMARY ADJUDICATION**

EXHIBITS A and B FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

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*Attorneys for Defendants and Counterclaimants John Branca and John McClain,
Executors of the Estate of Michael J. Jackson*

DECLARATION OF ANALISA VALLE

I, AnaLisa Valle, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my personal knowledge:

1. From August 9, 2010 to December 31, 2015, I served and was employed as in-house counsel for Lightning Entertainment Group, Inc. ("Lightning Entertainment"), and during that time served and was employed as general counsel for Lightning Entertainment from March 2013 to December 2015.

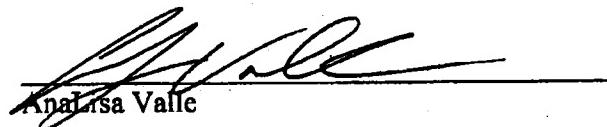
2. Attached hereto as **Exhibit A** is a true and correct copy of a two-page letter that I authored, signed, and sent to Noval Williams Films LLC, care of Raymond J. Markovich, on May 27, 2014. I authored, signed, and sent this May 27, 2014 letter to Noval Williams Films LLC (a) on behalf of Lightning Entertainment; (b) in the ordinary course and scope of my employment and duties at Lightning Entertainment; (c) in the ordinary course of business activities and practices I regularly conducted for Lightning Entertainment; (d) at or near the time of the time of the information contained in the May 27, 2014 letter; and (e) with personal knowledge of the information contained in the May 27, 2014 letter. This May 27, 2014 letter was generated and maintained in the regular course of Lightning Entertainment's business. To the best of my knowledge, all of the information set forth in this May 27, 2014 letter is true and correct. The signature at the end of this May 27, 2014 letter is my signature.

3. Attached hereto as **Exhibit B** is a true and correct copy of a one-page letter that I authored, signed, and sent to Noval Williams Films LLC, care of Raymond J. Markovich, on June 26, 2014. I authored, signed, and sent this June 26, 2014 letter to Noval Williams Films LLC (a) on behalf of Lightning Entertainment; (b) in the ordinary course and scope of my employment and duties at Lightning Entertainment; (c) in the ordinary course of business activities and practices I regularly conducted for Lightning Entertainment; (d) at or near the time

of the time of the information contained in the June 26, 2014 letter; and (e) with personal knowledge of the information contained in the June 26, 2014 letter. This June 26, 2014 letter was generated and maintained in the regular course of Lightning Entertainment's business. To the best of my knowledge, all of the information set forth in this June 26, 2014 letter is true and correct. The signature at the end of this June 26, 2014 letter is my signature.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my personal knowledge.

Executed on October /2, 2016, in Broomfield, Colorado.



Analisa Valle